

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

No. 21-mj-30421

-vs-

Sophia Martini,

Defendant.

**STIPULATION TO ADJOURN PRELIMINARY EXAM AND FOR
FINDING OF EXCLUDABLE DELAY UNDER THE SPEEDY TRIAL ACT**

The United States of America and the defendant, by and through its undersigned attorneys, move for an adjournment of the preliminary hearing and an ends-of-justice continuance under the Speedy Trial Act. In support, the parties state as follows:

1. Defendant Sophia Martini made her initial appearances on a complaint on September 1, 2021. She was released on bond, and the preliminary exam was adjourned until October 21, 2021, by stipulation of the parties.
2. The government and the defendant are engaged in pre-indictment plea negotiations, reviewing discovery, and conducting investigations. The parties wish to continue these endeavors through at least December 22, 2021. The parties agree that this constitutes good cause for an adjournment of the preliminary hearing,

taking into account the public interest in the prompt disposition of criminal cases.

See Fed. R. Crim. P. 5.1(d).

3. The parties also agree that the ends of justice served by granting an adjournment and excluding the time from calculation for defendant's investigation and plea negotiations outweigh the best interests of the public and the defendant in a speedy trial and that, therefore, the period from October 21, 2021 through December 22, 2021, should be excluded in calculating the time within which an indictment or information must be filed under the Speedy Trial Act, 18 U.S.C. §§ 3161(b), 3161(h)(7). In light of the above, the government submits that there is good cause to adjourn the preliminary hearing.

Respectfully submitted,

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Dated: October 20, 2021

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ORDER

This matter coming before the Court on the stipulation of the government and defendant Sophia Martini, for the reasons stated in the stipulation, the Court

(1) finds that the parties have been engaged in and will continue to be engaged in pre-indictment investigations and plea negotiations from October 21, 2021 through December 22, 2021;

(2) finds that this constitutes good cause for the adjournment of the preliminary hearing, taking into account the public interest in the prompt disposition of criminal cases, see Fed. R. Crim. P. 5.1(d);

(3) adjourns the preliminary hearing in this case from October 21, 2021, through December 22, 2021;

(4) finds that the ends of justice served by granting an adjournment and excluding the time from calculation outweigh the best interests of the public and the defendant in a speedy trial under 18 U.S.C. § 3161(h)(7); and

(5) determines that the period from October 21, 2021 through December 22, 2021, should be excluded in calculating the time within which an indictment or information must be filed under the Speedy Trial Act, 18 U.S.C. § 3161(b).

s/Kimberly G. Altman
Hon. Kimberly G. Altman
United States Magistrate Judge

Entered:10/20/2021